

Serial No. 09/768,466  
Docket No. FF-0131 US

10

### **REMARKS**

Claims 1-35 are all the claims presently pending in the application. Claims 1, 8, 15, 22, 27 and 32 have been amended to more particularly define the invention.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicant specifically states that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Applicant gratefully acknowledges that claims 5, 12 and 19 would be allowed if rewritten in independent form. However, Applicant respectfully submits that all of the claims are allowable and, therefore, declines to rewrite these claims at this time.

Claims 1-4, 6-11, 13-18 and 20-35 stand rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Cannon, et al. (U.S. Patent No. 5,748,484) in view of Microsoft ® Word 2000 (Screenshots 1-8) (hereinafter "the Microsoft ® Word 2000 screenshots" or "screenshots 1-8").

These rejections are respectfully traversed in the following discussion.

#### **I. THE CLAIMED INVENTION**

The claimed invention, as recited, for example, in claim 1, is directed to an operation screen creating system for creating an operation screen. The system includes a paste-up information receiving unit for receiving paste-up information to paste on information pasting regions on the operation screen, a paste-up information setting unit for setting the position and size of the paste-up information to be pasted on the information pasting regions on the operation screen, a barycenter of the paste-up information coinciding with a predetermined point on the operation screen, and an operation screen creating unit for creating a new operation screen according to the result of the setting set by the paste-up information setting unit. The operation screen is for a control terminal which controls a remote terminal via a communication line, and the operation screen creating unit includes an editing device for editing at least one of a position and size of the information pasting regions to create the operation screen for controlling the remote terminal.

Serial No. 09/768,466  
Docket No. FF-0131 US

11

Importantly, the paste-up information is pasted on the information pasting regions based on a relative position and size of the information pasting regions (Application at page 12, lines 2-14).

Conventional operation screen creating systems include many different kinds of screen pages (Application at page 4, lines 6-7). As a result, it takes a lot of time and effort to make these screen pages individually (Application at page 4, lines 9-10).

In the claimed invention, on the other hand, the paste-up information is pasted on the information pasting regions based on a relative position and size of the information pasting regions. This feature allows a customer to create (e.g., automatically create) screen pages that may be easily viewed by the customer regardless of the size of the paste up information (Application at page 12, lines 12-14).

## II. CANNON AND THE MICROSOFT ® WORD 2000 SCREENSHOTS

The Examiner alleges that Cannon would have been combined with Microsoft ® Word 2000 to form the claimed invention of claims 1-4, 6-11, 13-18 and 20-35. Applicant submits, however, that these references would not have been combined and even if combined, the alleged combination would not teach or suggest each and every element of the claimed invention.

Cannon discloses a system for ordering and printing social expression (i.e., greeting) cards. The system includes a database preparation system, a number of card display/order systems, and a number of card printing systems (Cannon at Abstract).

The Microsoft ® Word 2000 screenshots disclose a display screen for displaying an image in a word processing document. The screenshots also disclose a toolbar which may be used to "crop" (e.g., adjust the size of) the image to be displayed on the screen (e.g., see screenshot 3).

Applicant respectfully submits that these references are completely unrelated and would not have been combined as alleged by the Examiner. Indeed, Cannon is directed to a system for ordering and printing social expression (i.e., greeting) cards, whereas the Microsoft ® Word 2000 screenshots are directed to a display screen which may be used to adjust the size of an image in a word processing document. Thus, no person of ordinary skill in the art would have considered combining these disparate references, absent impermissible

Serial No. 09/768,466  
Docket No. FF-0131 US

12

hindsight.

Further, Applicant submits that there is no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, these references clearly do not teach or suggest their combination. Therefore, Applicant respectfully submits that one of ordinary skill in the art would not have been so motivated to combine the references as alleged by the Examiner. Therefore, the Examiner has failed to make a prima facie case of obviousness.

Moreover, neither Cannon, nor the Microsoft® Word 2000 screenshots, nor any alleged combination thereof teaches or suggests "*wherein said paste-up information is pasted on said information pasting regions based on a relative position and size of said information pasting regions*", as recited, for example, in claims 1, 8, 15, 22, 27 and 32.

As noted above, unlike conventional operation screen creating systems in which a lot of time and effort is required to make the screen pages individually (Application at page 4, lines 9-10), in the claimed invention the paste-up information is pasted on the information pasting regions based on a relative position and size of the information pasting regions. This feature allows a customer to create (e.g., automatically create) screen pages that may be easily viewed by the customer regardless of the size of the paste up information (Application at page 12, lines 12-14).

Specifically, in an exemplary aspect of the claimed invention, if the paste-up information is small compared to the preset information pasting region (e.g., the information pasting region has a lot of space), or if the paste-up information is big compared to the preset information pasting region (e.g., the paste-up information would spill over the information pasting region), the size of the paste-up information may be automatically altered so that the paste-up information is enlarged or reduced accordingly (e.g., to fit the size of the information pasting region) (Application at page 12, lines 2-11).

Clearly, these features are not taught or suggested by the cited references. Indeed, Cannon merely teaches a Cardmaker program in which the user may select a desired "page", and then enter an image position (e.g., center, top, etc.) on the page (Cannon at col. 11, lines 46-67). In fact, Applicant would point out that Cannon may address where an image is to be positioned **on the card**, but nowhere does Cannon address how or where the image is to be displayed **on the display screen**.

Serial No. 09/768,466  
Docket No. FF-0131 US

13

Moreover, Applicant would respectfully point out to the Examiner that the claimed invention (e.g., as recited in claim 1) is directed to "[a]n operation screen creating system **for creating an operation screen**". That is, the claimed invention may be used to create a specific type of screen - an operation screen (e.g., a screen which may be used to operate something, perform an operation, etc.). For example, the operation screen may be used to a control a remote terminal via a communication line.

Even assuming (arguendo) that Cannon does teach displaying the card which is a user is creating by using the Cardmaker program, the screen would be a "result screen", and **not an "operation screen"** as in the claimed invention. Indeed, Cannon is not even concerned with an "operation screen", let alone a system or method of creating such an operation screen.

In short, Cannon may teach a program which may be used to make greeting cards, and Cannon may teach a display screen, but Cannon does not teach or suggest an operation screen or operation screen creating system, and certainly does not teach or suggest such a system in which the image is displayed in a particular region of an operation screen based on a relative position and size of that region.

Further, Cannon teaches that the user may select a font of text to be added to the card (Cannon at col. 12, lines 1-12). That is, Cannon teaches that the size of the text printed on the card must be selected by the user and is completely unrelated to a position and size of any region on a display screen.

Likewise, the Microsoft ® Word 2000 screenshots do not teach or suggest these features. Indeed, Applicant would submit that even assuming that screenshot 3 illustrates an "operation screen", **nowhere does screenshot 3 teach or suggest how the "operation screen" illustrated therein is created which is an important aspect of the claimed invention.**

Indeed, Applicant would point out that the word processing software (e.g., Microsoft ® Word 2000) used to generate the screenshots may allow the user to customize a display to a certain extent. That is, the user may add or delete a toolbar or ruler. However, even assuming that a user may "create an operation screen" by adding or deleting a ruler, this is completely unrelated to the claimed invention in which paste-up information is pasted on information pasting regions based on a relative position and size of the information pasting regions.

Serial No. 09/768,466  
Docket No. FF-0131 US

14

Indeed, Applicant would point out that on page 5 of the Office Action the Examiner implies that the image in screenshot 3 (e.g., the star image) is both a "pasted image" and an "information pasting region". Applicant would submit that this is clearly unreasonable.

Further, as noted above, the screenshots merely disclose a toolbar which may be used to "crop" (e.g., **adjust the size of) the image to be displayed on the screen** (e.g., see screenshot 3). In fact, the Examiner merely alleges that the screenshots disclose a "screen creation interface that receives and sets the position and size and pastes information on the display screen".

Applicant would submit that even assuming (arguendo) that the star image on the screenshots can be equated with paste-up image in the claimed invention, it is likely that the **star image will be always be displayed on a display screen in the same size and position**, regardless of position and size of any particular region on the display screen. That is, nowhere do the screenshots teach or suggest pastings the star image on a particular region of a display screen based on a relative position and size of the region. Thus, the screenshots clearly do not make up for the deficiencies of Cannon.

Therefore, Applicant submits that these references would not have been combined and even if combined, the alleged combination would not teach or suggest each and every element of the claimed invention. Therefore, the Examiner is respectfully requested to withdraw this rejection.

### III. FORMAL MATTERS AND CONCLUSION

In view of the foregoing, Applicant submits that claims 1-35, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

Serial No. 09/768,466  
Docket No. FF-0131 US

15

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

Date:

5/31/05

Phillip E. Miller, Esq.  
Registration No. 46,060

**McGinn & Gibb, PLLC**  
8321 Old Courthouse Road, Suite 200  
Vienna, VA 22182-3817  
(703) 761-4100  
Customer No. 21254

**CERTIFICATE OF FACSIMILE TRANSMISSION**

I hereby certify that the foregoing Amendment was filed by facsimile with the United States Patent and Trademark Office, Examiner Ting Zhou, Group Art Unit # 2173 at fax number (703) 872-9306 this 31<sup>st</sup> day of May, 2005.



Phillip E. Miller  
Reg. No. 46,060